

# EXHIBIT

## A

**EXHIBIT A**

**PICKER LAW OFFICES**  
**BY: Jonathan A. Picker, Esquire**  
**526 Swede Street**  
**Norristown, PA 19401**  
**(610) 277-6660**

**Attorney for Plaintiff Krystle Rumsey**

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A. SILLIGRINT



**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY,  
PENNSYLVANIA  
CIVIL ACTION – LAW**

<b>KRYSTLE RUMSEY</b>	:	<b>No.</b>
<b>816 N.W. 111<sup>th</sup> Avenue</b>	:	
<b>Plantation, FL 33324</b>	:	
<b>vs.</b>	:	
<b>WALMART</b>	:	
<b>2200 Wheatsheaf Lane</b>	:	
<b>Philadelphia, PA 19137</b>	:	
<b>and</b>	:	
<b>WALMART STORES, INC.</b>	:	
<b>2200 Wheatsheaf Lane</b>	:	
<b>Philadelphia, PA 19137</b>	:	

**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and a filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.**

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en personal o con un abogado y entregar la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. See avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas la corte puede Sequire a favor del demandante y Sequire que usted cumpla con todas las provisione De esta demanda. Usted puede perder dinero or sus propiedades u otros derechos importantes para Usted.

**LLEVE ESTA DEMANDA A UN ABOGADO IN-MEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENT DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR FONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.**

**PHILADELPHIA BAR ASSOCIATION**  
**Lawyer Referral and Information Service**  
**One Reading Center**  
**Philadelphia, PA 19107**  
**(215)238-1701**

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**PICKER LAW OFFICES**

**BY: JONATHAN A. PICKER, ESQUIRE**

**Attorney ID #85094**

**Attorney for Plaintiff**

**526 Swede Street**

**Norristown, PA 19401**

**(610) 277-6660**

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**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY, PA  
CIVIL ACTION – LAW**

<b>KRYSTLE RUMSEY</b>	<b>:</b>	<b>No.</b>
<b>816 N.W. 111<sup>th</sup> Avenue</b>	<b>:</b>	
<b>Plantation, FL 33324</b>	<b>:</b>	
	<b>:</b>	
<b>vs.</b>	<b>:</b>	
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<b>WALMART</b>	<b>:</b>	
<b>2200 Wheatsheaf Lane</b>	<b>:</b>	
<b>Philadelphia, PA 19137</b>	<b>:</b>	
<b>and</b>	<b>:</b>	
<b>WALMART STORES, INC.</b>	<b>:</b>	
<b>2200 Wheatsheaf Lane</b>	<b>:</b>	
<b>Philadelphia, PA 19137</b>	<b>:</b>	

**COMPLAINT IN CIVIL ACTION**

1. The Plaintiff Krystle Rumsey is an adult individual residing at  
816 N.W. 111<sup>th</sup> Avenue, Plantation, Florida, 33324.
2. The Defendant Walmart is a retail store doing business in Pennsylvania at  
2200 Wheatsheaf Lane, Philadelphia, Philadelphia County, Pennsylvania.
3. The Defendant Walmart Stores, Inc. is a corporation and retail store  
doing business in Pennsylvania at 2200 Wheatsheaf Lane, Philadelphia, Philadelphia  
County, Pennsylvania.
4. At all times relevant hereto, the Defendants owned, maintained and

operated a Walmart retail store located at 2200 Wheatsheaf Lane, Philadelphia, Philadelphia County, Pennsylvania.

5. On or about September 12, 2019 at or about 12:30 PM, the Plaintiff entered into the Walmart retail store located at 2200 Wheatsheaf Lane, Philadelphia, Philadelphia County, Pennsylvania for the purpose of purchasing various articles therein.

6. While the Plaintiff was in the act of shopping in the premises, she was caused to slip, trip and fall to the ground by reason of a dangerous condition consisting of a box of ointment left on the floor of the store causing her to suffer injuries which will hereinafter be more fully described.

7. The aforesaid occurrence was due entirely to the negligence of the Defendants by its servants, agents or employees acting within the scope of their employment for and in behalf of the Defendants.

8. The negligence of the Defendants, its servants, agents and employees as aforesaid consisted of the following:

a. Failing to maintain the floors, aisles and walkways within the store in a condition which would protect and safeguard persons lawfully shopping within the store.

b. Failing to properly and adequately maintain the floors, aisles and walkways of the store so as to prevent a dangerous condition, being the box of ointment

left of the floor of the store and expose Plaintiff and other business invitees so as to constitute a menace, danger, nuisance, snare and trap for persons lawfully walking upon the floor of the store.

c. Permitting the floors, aisles and walkways of the store to have the box of ointment upon it so as to constitute a menace, danger, nuisance, snare and trap for persons lawfully walking upon the floors of the store.

d. Failing to have said floor, aisle and walkway inspected at reasonable intervals in order to determine the condition of said floor, aisle and walkway.

e. Failing to adequately clean, sweep, mop and maintain said floor, aisle and walkway within the store so as to assure that said floor, aisle and walkway would be safe to walk upon.

f. Failing to warn persons using the floor, aisle and walkway of the store, including the Plaintiff, of the dangerous condition which existed in the floor, aisle and walkway of the store at the time of the occurrence.

g. Disregarding the rights and safety of the Plaintiff and other persons lawfully walking upon the floor, aisle and walkway of the store while shopping.

h. Failing to adequately inspect the premises of the store so that the floor, aisle and walkway within the store would be maintained in a condition that was safe for business invitees to walk upon.

i. Otherwise failing to exercise due care under the circumstances.

9. Solely as a result of the aforesaid negligence, Plaintiff was caused to suffer various physical injuries in and about her person including but not limited to

lumbar sprain and strain; cervical sprain and strain; left knee internal derangement; left knee medial and lateral meniscus tear; left shoulder sprain and strain; left shoulder tendinitis and tendinopathy and sprain of left hip.

10. Further, Plaintiff incurred a severe shock to her nervous system, great physical pain and mental anguish, all of which may continue for an indefinite time in the future.

11. Plaintiff has been compelled to expend various sums of money for medicines and medical attention in attempting to alleviate and cure the aforesaid injuries all to her great financial loss.

12. As a further result of the aforesaid accident, Plaintiff has been unable to engage in her usual activities and occupation and has suffered a loss of income and/or impairment of her earning capacity to her great loss and detriment.

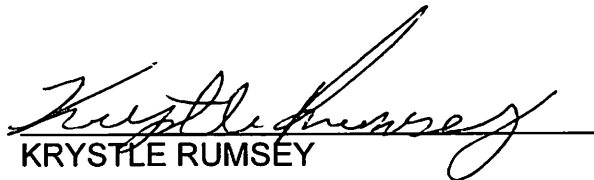
WHEREFORE, the Plaintiff claims damages from the Defendants, jointly and severally, in an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus damages for delay, interest and costs.

PICKER LAW OFFICES

By:   
JONATHAN A. PICKER, ESQUIRE  
Attorney for Plaintiff

VERIFICATION

I, KRYSTLE RUMSEY, verify that the averments contained herein are true to my personal knowledge or information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

  
KRYSTLE RUMSEY